

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE NORTHERN DISTRICT OF ILLINOIS**

**In the Matter of:**

Brittany L. Brooks

**Debtor(s)**

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}  
}

Case No. 20-20342

Chapter 13

Judge Donald R. Cassling

Cook County

**NOTICE OF MOTION**

TO:

Thomas H. Hooper, Chapter 13 Trustee, 55 E. Monroe, Suite 3850, Chicago, IL 60603, via electronic court notification;

Credit Acceptance, 25505 West 12 Mile Road, Suite 3000, Southfield, MI 48034, via U.S. Mail;

Christopher H. Purcell, Attorney for Credit Acceptance, Sherman & Purcell LLP, 112 Cary Street, Cary, IL 60013, via U.S. Mail;

Jaime Dowell, Attorney for City of Chicago, 121 N. LaSalle St., Ste 400, Chicago, IL 60602, via U.S. Mail;

Brittany L. Brooks, 2017 W. 62<sup>nd</sup> St., 2<sup>nd</sup> Floor, Chicago, IL 60636; via U.S. mail;

SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE that on June 16, 2022, at 9:30 a.m., I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, and present the motion of Debtor to Modify Plan, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.**

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 414 7941 and the password is 619. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

### **PROOF OF SERVICE**

I, the undersigned, certify that I caused this Notice and a copy of the attached document(s) to be served upon the entities named above by depositing the same in the U.S. Postal Service's mail box at 8707 Skokie Blvd Suite 305, Skokie, IL 60077 on May 25, 2022, except that the Trustee and any other party indicated in the Notice of Filing were served electronically by the court on such date.

/s/ David Freydin

David Freydin, Esq  
Law Offices of David Freydin  
8707 Skokie Blvd, Suite 312  
Skokie, IL 60077  
Phone: 847.972.6157

Label Matrix for local noticing  
0752-1  
Case 20-20342  
Northern District of Illinois  
Eastern Division  
Tue Nov 17 15:25:17 CST 2020

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

Document Page 3 of 5

Capital One  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130-0285

City of Chicago Dept of Finance  
121 N. LaSalle Street, 7th Floor  
Chicago, IL 60602-1202

Credit Acceptance  
25505 West 12 Mile Road  
Suite 3000  
Southfield, MI 48034-8331

(p)CREDITORS' DISCOUNT & AUDIT CO CDA  
ATTN KEN ARMSTRONG  
415 E MAIN ST  
PO BOX 213  
STREATOR IL 61364-0213

(p)DEVON FINANCIAL SERVICES INC  
6414 N WESTERN AVE  
CHICAGO IL 60645-5422

Jackie Brown  
Chicago, IL 60613

Navient  
Attn: Claims Dept  
Po Box 9500  
Wilkes-Barr, PA 18773-9500

Regional Recovery Serv  
P.O. Box 3333  
Munster, IN 46321-0333

SpeedyRapid Cash  
P.O. Box 780408  
Wichita, KS 67278-0408

T-Mobile c/o American InfoSource  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Brittany L Brooks  
2017 W. 62nd St., 2nd Floor  
Chicago, IL 60636-2178

David Freydin  
Law Offices of David Freydin Ltd  
8707 Skokie Blvd  
Suite 312  
Skokie, IL 60077-2269

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Tom Vaughn  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Creditors Discount & Audit Co  
Attn: Bankruptcy  
Po Box 213  
Streator, IL 61364

Devon Financial Services  
2754 W 63rd St  
Chicago, IL 60629

End of Label Matrix  
Mailable recipients 15  
Bypassed recipients 0  
Total 15

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**In the Matter of:**

Brittany L. Brooks

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Cook County

**DEBTOR'S MOTION TO MODIFY PLAN**

NOW COMES THE DEBTOR by and through her attorney, David Freydin, and requests that this Honorable Court modify the Chapter 13 Plan under Section 1329 for the reasons below, and in support thereof, states as follows:

1. That the Debtor filed a Chapter 13 bankruptcy petition in the Northern District of Illinois, Eastern Division as case number 20-20342 on December 17, 2020.
2. That this Honorable Court confirmed the Debtor's Chapter 13 Plan on January 6, 2021, with secured creditors to be paid 100.00% and general unsecured creditors to be paid 10.00%.
3. That the Debtor has not converted the instant Chapter 13 case to a Chapter 7 case. That the Debtor's confirmed plan requires her to pay \$466.00 per month for 60 months.
4. That the Debtor lost her job and was unemployed for a short period of time at the beginning of 2022.
5. That as a result of the loss of income, Debtor fell behind on her Chapter 13 Plan payments and has been unable to cure the default.
6. That the Debtor has recently started working again and has been receiving a steady income and will resume making her Chapter 13 plan payments.

7. That the Debtor asks this Honorable Court to defer the plan default through May 2022 so that she may successfully complete her Chapter 13 case continuing to pay the secured creditors 100% general unsecured creditors 10%.
8. That by deferring the current default, the creditors that have filed claims in this case will receive more than they would if the case were dismissed, or if the Debtor was forced to convert case to one arising under Chapter 7 of the Bankruptcy Code.
9. That the Debtor filed the instant case in good faith and intends to complete the Plan of Reorganization.

WHEREFORE THE MOVANT PRAYS that this Honorable Court enter an order modifying the Chapter 13 plan to:

- A. That this Honorable Court enter an order modifying the Debtor's Chapter 13 Plan in order to defer the current default; and
- B. For such other and further relief this Court deems just and proper.

/s/ David Freydin

David Freydin  
Law Offices of David Freydin, PC  
8707 Skokie Blvd., Suite 312  
Skokie, IL 60077  
Phone: 847.972.6157